

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)	
)	No. 3:22-cr-00282
v.)	
)	JUDGE RICHARDSON
[1] GLEN CASADA)	
[2] CADE COTHREN)	

UNOPPOSED MOTION TO CONTINUE TRIAL

The United States of America, through Thomas Jaworski, First Assistant United States Attorney for the Middle District of Tennessee, Assistant United States Attorney Amanda J. Klopf, Corey R. Amundson, Chief of the Public Integrity Section of the United States Department of Justice, and Trial Attorneys John P. Taddei and Blake J. Ellison (collectively, “United States” or “government”), respectfully moves this Court to continue the trial date currently set for March 5, 2024, and related trial deadlines. Defendant Glen Casada, by and through his attorney of record Jonathan Farmer, and defendant Cade Cothren, by and through his attorney Joy Longnecker, are unopposed.

In support thereof, on or about January 30, 2024, pursuant to a separate investigation, the government seized electronic devices belonging to defendant Cothren and others. Those devices likely contain discoverable material as to defendant Cothren, including, but not limited to, material covered by Federal Rule of Criminal Procedure 16, and may contain discoverable material as to defendant Casada. Before the investigative team in that matter can provide any potentially discoverable material to the government’s trial team in this matter, a filter team will need to conduct a review of Cothren’s device and potentially other devices and withhold any privileged communications. The timeframe required to perform that process and to produce any additional

discovery to the defendants necessitates a continuance of the current March 5, 2024, trial date and related deadlines.

The government's preference for a new trial date is May 6, 2024, followed by May 13, 2024, and April 29, 2024. Casada has not indicated a preference, other than to avoid conflict with a trial currently scheduled to begin before this Court on April 16, 2024, in which Mr. Farmer is counsel. Cothren's preference is to set a new trial date after the Supreme Court issues a decision in *Snyder v. United States*, cert. granted, 23-108 (Dec. 13, 2023). See Doc. No. 109. The government's position is that the Supreme Court's grant of certiorari in *Snyder* does not provide a basis for continuance. See Doc. No. 113. The parties are prepared to discuss their preferred dates and, if the Court's schedule requires, alternative dates during the telephonic conference scheduled for February 2, 2024.

The government requests that the Court enter an order of excludable delay for the period between January 30, 2024, and the newly scheduled date of trial to permit the government adequate time to provide any additional discoverable materials to the defendants and for the defendants to review the materials.¹ The government respectfully submits that the ends of justice served by such an excludable delay outweigh the best interests of the public and the defendants in a speedy trial. See 18 U.S.C. § 3161(h)(7)(A).

¹ In January 2024, defendant Cothren consented to having trial in this case continued until December 2024 and waived his rights under the Speedy Trial Act until then. Doc. No. 111. In August 2023, defendant Casada waived his rights under the Speedy Trial Act until the currently scheduled trial date of March 5, 2024. Doc. No. 77-1.

Respectfully submitted,

THOMAS JAWORSKI
Attorney for the United States
Middle District of Tennessee
Acting Under Authority Conferred by 28
U.S.C. § 515

COREY R. AMUNDSON
Chief
Public Integrity Section

By:

By:

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing motion was electronically filed with the Clerk on February 1, 2024, and service was made upon all persons registered in that case via CM/ECF and/or by email.

/s/ John P. Taddei
JOHN P. TADDEI
Trial Attorney